

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Glenn Williams, et al.,)	
)	
<i>Plaintiffs</i>)	
)	No. 20-cv-420
-vs-)	
)	<i>(Judge Kendall)</i>
City of Chicago, et al.,)	
)	
<i>Defendants.</i>)	

**PLAINTIFFS' RESPONSE TO MOTIONS TO DISMISS
(ECF Nos. 108, 136, 137, 139, 141, 143, 145, and 147)**

NOW COME, plaintiffs, by and through undersigned counsels, and respond to the multiple defendants' motions to dismiss pending before the Court as ECF Nos. 136, 137, 139, 141, 143, 145, and 147, plaintiffs state that as of this time, they do not oppose dismissal (without prejudice) of all federal claims against all defendants other than the City of Chicago. Plaintiffs request that the Court decline to exercise jurisdiction over all state law claims advanced against all defendants other than the City of Chicago. In the alternative, plaintiffs request that the Court grant them leave to file a second amended complaint to restate the state law claims against these defendants in a more concise manner than in the operative complaint.

As to the motion to dismiss filed by defendant City of Chicago (ECF No. 108), plaintiffs respectfully request 28 days to file a second amended complaint, naming the City of Chicago as the sole defendant and providing a short and plain statement of the Court's jurisdiction and the claims advanced by plaintiffs.

Grounds for this request are based upon that the operative complaint is unclear about the nature of plaintiffs' federal claims and the parties against whom those claims are asserted. An amended complaint will assist the Court and the parties in

addressing the issues presented in this case. Plaintiffs respectfully submit that the time and effort that will be saved by proceeding on a streamlined complaint against a single defendant will outweigh the 28 days plaintiffs request to prepare and file the second amended complaint.

Respectfully submitted¹,

/s/ Robert A. Holstein
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¹ This memorandum was prepared by attorney Kenneth N. Flaxman, whose motion for leave to appear for plaintiffs is pending.